

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

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Attorney for Debtor  
RM-1141

In Re:

Karen Prokapus

Case No. 16-14196MBK

Judge:

Chapter 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

**X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

**TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following  
(choose one):

1.   X   Motion for Relief from the Automatic Stay filed by Wells Fargo Bank  
NA. creditor. A hearing has been scheduled for 10/17/2017, at 10:00 a.m.

OR

       Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has  
been scheduled for            at            a.m.

OR

       Certification of Default filed by           , creditor. I am requesting that a  
hearing be scheduled on this matter.

OR

       Certification of Default filed by Standing Chapter 13 Trustee.  
I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

\_\_\_\_\_ Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto.

OR

\_\_\_\_\_ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

**X** Other: Wells Fargo Bank NA.'s agents severely vandalized the real estate and removed personal property from the real estate, which resulted in the inhabitability of the real estate. Consequently, I was unable to rent the real estate and make the mortgage payments. I intend to file a Cross Motion for damages regarding this matter. I respectfully request that the movant's motion be denied.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: \_\_\_\_\_

/s/ Karen Prokapus, Debtor  
Karen Prokapus, Debtor